

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

BOBBY MORRIS, individually and on	)	
behalf of all others similarly situated,	)	
	)	CASE NO. 4:25-CV-00066
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
BLENDERS EYEWEAR, LLC	)	
	)	
	)	
Defendant.	)	

**CONSENT MOTION FOR EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b), and with the consent of Plaintiff, Defendant Blenders Eyewear, LLC (“Blenders”) respectfully moves this Court for an extension of time up to and including July 29, 2025, to answer, move, or otherwise respond to the Complaint in this action. In support, Blenders states as follows:

1. On January 16, 2025, Plaintiff filed a Complaint against Safilo America, Inc. (“Safilo”) in the above-captioned action. Doc. 1.
2. On May 15, 2025, Plaintiff filed a motion to substitute Blenders as the defendant in the above-captioned action. Doc. 14. The Court granted Plaintiff’s motion to substitute on May 16, 2025. Doc. 15.
3. Blenders’ response to the Complaint is currently due July 15, 2025. Doc. 16.
4. Counsel for Blenders, Max Kaplan, recently went on parental leave, and will be unavailable until later this year. Additionally, counsel for Blenders, Jeffrey Monhait, has pre-planned travel out of the country from July 2, 2025 to July 10, 2025, and then will be packing his

home and moving to a different state. Due to these personal circumstances of Blenders' counsel, Blenders' respectfully requests additional time to respond to Plaintiff's Complaint.

5. Blenders thus respectfully requests an additional fourteen (14) days to answer, move, or otherwise respond to the Complaint. Blenders seeks this brief extension of time to alleviate personal conflicts of Counsel with the current deadline, and allow Counsel necessary time to respond to the Complaint.

6. Counsel for Blenders conferred with counsel for Plaintiff regarding this request via email on June 30, 2025 and July 1, 2025, and Plaintiff consents to this request.

7. This request is made in good faith and not for purposes of delay, and no party will be prejudiced should this request be granted.

8. This is the first extension of time Blenders has sought in this action, and the fourth overall extension of time that a defendant in this action has requested. Safilo submitted the prior three extension requests before Plaintiff substituted Blenders for Safilo.

WHEREFORE, for the foregoing reasons, Blenders respectfully requests that this Court issue an Order granting this Consent Motion and extending Blenders' time to answer, move, or otherwise respond to the Complaint through and including July 29, 2025.

Dated: July 1, 2025

**COZEN O'CONNOR**

By: /s/ Jeffrey M. Monhait

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*Attorneys for Defendant Safilo American, Inc.  
d/b/a Blenders Eyewear*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on July 1, 2025, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing on all parties of record.

/s/ Jeffrey M. Monhait

Jeffrey M. Monhait, Esquire